

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER GRANTING THE CELSIUS LITIGATION ADMINISTRATOR'S  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Upon consideration of *The Celsius Litigation Administrator's Motion for Relief From the Automatic Stay* (the "Motion"),<sup>2</sup> and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the FTX Debtors' estates, their creditors, and other parties in interest; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice need be provided; and after due deliberation thereon; and good and sufficient cause appearing therefor,

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

It is HEREBY ORDERED THAT:

1. The relief requested in the Motion is GRANTED as set forth herein.
2. The automatic stay in the FTX Debtors' bankruptcy cases is modified for cause pursuant to Section 362(d)(1) of the Bankruptcy Code to allow the Celsius Litigation Administrator to commence, adjudicate and liquidate the FTX Preference Actions to final judgment in the Celsius Bankruptcy in the NY Celsius Bankruptcy Court.
3. With respect to the Customer Preference Actions, the automatic stay is modified to allow the Celsius Litigation Administrator to seek and enforce relief against the FTX Debtors as it relates to the redirection of distributions on account of Class 5A and/or Class 5B claimants (or any other applicable class) under the FTX Plan to Celsius who are initial transferees of the transfers at issue; provided, however, that no distributions by the FTX Debtors on account of Customer Preference Actions shall exceed the amounts otherwise payable to such Class 5A and/or Class 5B claimants (or any other applicable class) under the proposed FTX Plan.
4. This order is without prejudice to any and all other rights of Celsius and the Celsius Litigation Administrator with respect to the FTX Preference Actions, all of which are hereby reserved.
5. The fourteen (14) day stay under rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure is hereby waived, and this Order shall become effective immediately.
6. This Order is without prejudice to the Celsius Litigation Administrator's right to seek other or further relief from the automatic stay in appropriate circumstances.
7. Notwithstanding anything herein to the contrary, this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, enforcement, or

interpretation of this Order; provided that such retention of jurisdiction shall not limit the scope, prosecution or adjudication of the FTX Preference Actions in the NY Celsius Bankruptcy Court.